

FILED

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

2018 AUG 27 A 10:58

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

WENGUI GUO
a/k/a MILES KWOK
781 Fifth Avenue, 18th Floor
New York, NY 10022

Plaintiff,

v.

BAOSHENG GUO
14440 Clubhouse Rd
Gainesville, VA 20155

Defendant,

CIVIL NO. 18-

cv - 1064
TSE/IDD

NOTICE OF REMOVAL

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA, ALEXANDRIA DIVISION

DEFENDANT'S NOTICE OF REMOVAL

Defendant files this notice to removal under 28 U.S.C. §1446(a).

A. Introduction

1. Plaintiff is { Wengui Guo }; defendant is { Bao-sheng Guo }.
2. On August 6, 2018, plaintiff sued defendant for the false, misleading, disparaging, defamatory statements and fraudulent misrepresentations in the Circuit Court of Prince William County of Virginia, WENGUI GUO v. BAOSHENG GUO, Docket No. 186754.
3. Defendant received notice of the suit on August 15, 2018.

B. Basis for Removal

4. Removal is proper because

There is complete diversity between the parties. 28 U.S.C. §1332(a); *Darden v. Ford Consumer Fin. Co.*, 200 F.3d 753, 755 (11th Cir. 2000); *Laughlin v. Kmart Corp.*, 50 F.3d 871, 873 (10th Cir. 1995). Plaintiff is a citizen of the state of New York, not a United States citizen.

Defendant is a citizen of the state of Virginia, a United States citizen. The amount in controversy exceeds \$ 75,000, excluding interest, costs, and attorney fees. 28 U.S.C. §1332(a).

5. All pleadings, process, orders, and other filings in the state court action are attached to this notice as required by 28 U.S.C. §1446(a).

6. Venue is proper in this district under 28 U.S.C. §1441(a) because this district and division embrace the place where the removed action has been pending.

7. Defendant will promptly file a copy of this notice of removal with the clerk of the state Circuit court of Virginia where the action has been pending.

C. Jury Demand

8. Defendant demands a jury in the federal court.

D. Conclusion

The U.S. Federal Rules of Civil Procedure permits the defendant Bao-sheng Guo may remove an action from Virginia state circuit court to federal court (United States District Court Eastern District of Virginia). In order to invoke the federal court's diversity jurisdiction, one requirement is that the amount in controversy must exceed \$75,000. On August 24, 2018, the defendant Bao-sheng Guo removes an action from Virginia state circuit court of Prince William County to federal court (United States District Court Eastern District of Virginia, Alexandria Division).

E. DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 27th day of August 27, 2018

Respectfully submitted,

By: 

BAOSHENG GUO, Pro Se
14440 Clubhouse Rd
Gainesville, VA 20155
Tel. (228)-235-5736
E-mail: mandeusa@gmail.com

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

CERTIFICATE OF SERVICE

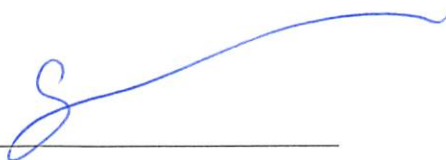
I hereby certify that on August 27, 2018, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to the following non-CM/ECF participants:_____.

J. David Morrissy, Of Counsel
Attorney for Plaintiff
Zeichner Ellman & Krause LLP
409 7th Street NW, Suite 300, Washington, D.C. 20004
Phone Number: 202-783-0316
E-mail: dmorrissy@zeklaw.com

Respectfully submitted,

Dated this 27th day of August 27, 2018

By:



BAOSHENG GUO, Pro Se
14440 Clubhouse Rd
Gainesville, VA 20155
Tel. (228)-235-5736
E-mail: mandeusa@gmail.com

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

WENGUI GUO
a/k/a MILES KWOK
781 Fifth Avenue, 18th Floor
New York, NY 10022

Plaintiff,

v.

BAOSHENG GUO
14440 Clubhouse Rd
Gainesville, VA 20155

Defendant,

CIVIL NO. 18-

CV 1064

JURY TRIAL

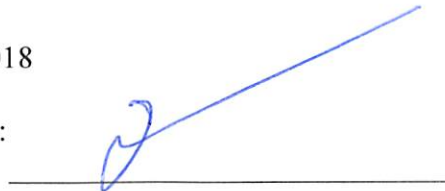
DEFENDANT'S DEMAND FOR JURY TRIAL

The defendant, Bao-sheng Guo, asserts his rights under the Seventh Amendment to the U.S. Constitution and demands, in accordance with the Federal Rules of Civil Procedure 38, a trial by jury on all issues.

Respectfully submitted,

Dated this 27th day of August 27, 2018

By:



BAOSHENG GUO, Pro Se
14440 Clubhouse Rd
Gainesville, VA 20155
Tel. (228)-235-5736
E-mail: mandeusa@gmail.com

**The defendant Guo Bao-sheng remove an action from Virginia state circuit court to federal court
(United States District Court Eastern District of Virginia)**

August 16, 2018

Prince William county circuit court civil division

TO: Guo Wengui (Cross-Defendant & Plaintiff)

FROM: Guo Bao-sheng (Cross-Plaintiff & Defendant)

Dear Prince William county circuit court civil division:

My name is Guo Bao-sheng, U.S. citizens, the author of 5 popular selling books, Chinese dissident and human rights activist, Chinese political and religious affairs commentators. Today I contact with you about this remove issues again:

Under Counter-claims--Rule 13 of the Federal Rules of Civil Procedure permits the When a defendant Guo Bao-sheng may remove an action from Virginia state circuit court to federal court (United States District Court Eastern District of Virginia)In order to invoke the federal court's diversity jurisdiction, one requirement is that the amount in controversy must exceed \$75,000.

Under 1>. The federal Racketeer Influenced and Corrupt Organizations Act (RICO) (18 USC §§ 1961-1968) prohibits (1) acquiring, establishing, or operating an enterprise with illegally derived income, (2) acquiring or maintaining an interest in or control of an enterprise through illegal activity, and (3) using an enterprise to commit illegal acts (Extortion, Blackmail, Etc., 31A Am Jur 2d); 2>. Cyberbullying ; Federal law provides some tools to combat cyberstalking. Under 18 U.S.C. 875(c), it is a federal crime, punishable by up to five years in prison and a fine of up to \$250,000, to transmit any communication in interstate or foreign commerce containing a threat to injure the person of another. Section 875(c) applies to any communication actually transmitted in interstate or foreign commerce - thus it includes threats transmitted in interstate or foreign commerce via the telephone, e-mail, beepers, or the Internet. This is the statute under which Jake Baker was charged. 3> Virginia's anti-SLAPP statute, Counter-Plaintiff & defendant Guo Bao-sheng counter-claims Plaintiff & counter-defendant Guo Wengui \$ 15 million US dollars money damages.

Actions filed in Virginia state circuit court may be removed by a defendant Guo Bao-sheng t to federal court within the 30 day period from the time the defendant Guo Bao-sheng had notice of the plaintiff Guo Wengui 's initial pleading.

TO: Guo Wengui (Counter-Defendant & Plaintiff)

FROM: Guo Bao-sheng (Cross-Plaintiff & Defendant)

Co- counterclaim defendants:

1). Wang DingGang – Luther---cyberstalking and Cyberbullying.

Address: 6589 Mermaid Cir Las Vegas NV89103

2). Cao Changqing---cyberstalking and Cyberbullying.

Address: 2747 Paradise Rd, Las Vegas, NV89109

3). Zeng Hong---cyberstalking and Cyberbullying.

Address:13 Michael St. Jamesburg. NJ08831

4). Jin qingmin---cyberstalking and Cyberbullying.

Address:1509 S Primrose Ave,Alhambra, CA 91803

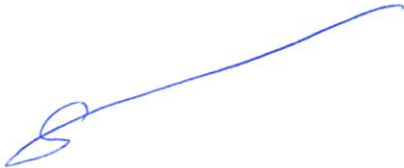
5). Calling Guo Wengui 's < Ant criminal band > of the crowd on the Internet ("John Doe"(for males) and "Jane Doe" (for females) are multiple-use names that are used in the case of somebody wishing to have the party who is given the name to Guo Wengui 's Ant criminal band—cyberstalking and Cyberbullying.)

Court note: Plaintiff & cross-Defendant Guo Wengui is not a United States citizen, Guo Wengui is the biggest fraudster of China this century, a rapist, white gloves of Communist Party of China . Guo Wengui is a suspected of imprisoning employees, document fraud, infringement of US trademark , bribe US politicians, publicly buying online thugs, and manipulating a series of terrorist threats in the United States.

Guo Wengui, the Chinese billionaire who's been living in self-imposed exile at the Sherry-Netherland, the 18th-floor co-op at 781 Fifth Avenue, New York City. Counter-Plaintiff & defendant Guo Bao-sheng counter-claims Plaintiff & counter-defendant Guo Wengui \$ 15 million US dollars money damages. Under Virginia's anti-SLAPP statute, in the pursuit of a fair and effective savings from US Federal Justice Resource, the Plaintiff & counter-Defendant Guo Wengui must shows this court that he has up to \$ 15 million US dollars Net Worth Money(cash, asset & property). If no, the court will dismiss the plaintiff's case early in the litigation and award defendant attorneys' fees and court costs as a matter of law.

Sincerely,

Guo Bao-sheng



Tel: 2282355736 Email mandeusa@gmail.com

U.S. PASSPORT NO.:573304901

8/16/2018

FILED

2018 AUG 16 PM 3:05

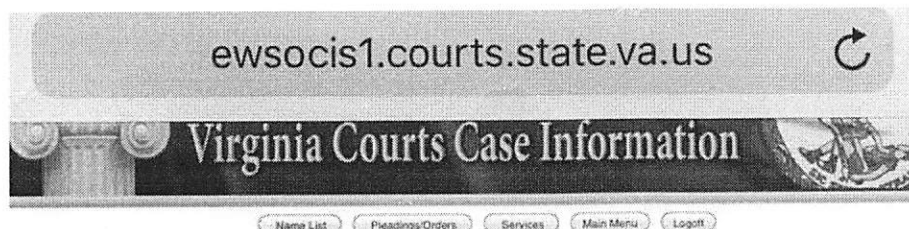
CIRCUIT COURT OF APPEALS
PRINCE WILLIAM COUNTY, VA

BY _____ DEPUTY

DC: 202-783-0316

NY: 212-826-5331

J. David Morrissey, Of Counsel



Prince William County Circuit - Civil Division

Case Details

Case Number: CL18006754-00	Filed: 08/06/18
Filing Type: General Tort Liability	Filing Fee Paid: Yes
Number of Plaintiffs: 0002	Number of Defendants: 0001
Commenced By: Initial Filing	
Bond:	Complex Case:

If there are more than three plaintiffs or defendants as indicated under "Number of Plaintiffs" or "Number of Defendants" in the table above, please contact the court for the additional party information.

Plaintiffs

Plaintiff 1: **GUO, WENGUI**
 Trading as:
 Attorney: **MORRISSY, J DAVID**

Plaintiff 2: **A/K/A MILES KWOK**
 Trading as:
 Attorney: **MORRISSY, J DAVID**

Defendants

Defendant: **GUO, BAOSHENGA**
 Trading as:
 Attorney: **PRO SE**

Hearings

#	Date	Time	Type	Room	Duration	Jury	Result
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Date Ordered To Mediation:

Final Disposition

Guo Wengui's excessive lawsuits abuse:

Cohen & Howard, LLP

Aaron A. Mitchell, Esquire

766 Shrewsbury Avenue, Suite 301

Tinton Fall, New Jersey 07724

Attorneys for Plaintiffs

(732)-747-5202

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----X
WENGUI GUO

a/k/a MILES KWOK

Civil Action No.:

Plaintiff,

COMPLAINT

v.

BIAO TENG

Defendant.
-----X

Plaintiff, Wengui Guo, a/k/a Miles Kwok (hereinafter, "Guo" or "Plaintiff"), by counsel, The Law Offices of Cohen & Howard, LLP, for his complaint against Defendant Biao Teng (hereinafter, "Teng" or "Defendant"), states the following:

STATEMENT OF THE CASE

Plaintiff brings this action for the false, misleading, disparaging, defamatory, and physically threatening statements by Defendant regarding Plaintiff and his family members.

1. Plaintiff Guo is a Chinese political dissident living in at 751 Fifth Avenue, in New York, New York. From the beginning of 2015, he regularly speaks on YouTube and Twitter about Chinese politics and human rights issues.

2. Guo is a pioneer of using YouTube and Twitter to fight for the rule of law, human rights, freedom and democracy in China. Guo has exposed widespread corruption

**THE SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

-----X
WENGUI GUO
a/k/a MILES KWOK

Index No.:

Plaintiff

SUMMONS

v.

Xianmin Xiong
a/k/a Xi Nuo, a/k/a "Frank",
a/k/a "Sino", a/k/a "Xino"

Defendant
-----X

To the above named Defendant:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiff's attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, New York
February 14, 2018

LAW OFFICES OF COHEN & HOWARD, L.L.P.

BY: 

Aaron A. Mitchell, Esquire
766 Shrewsbury Avenue, Suite 301
Tinton Falls, New Jersey 07724
(732) 747-5202
(732) 747-5259 (fax)
amitchell@cohenandhoward.com

TO: Xianmin Xiong
146-10 Holly Avenue
Flushing, New York 11355

Cohen & Howard, LLP
Aaron A. Mitchell, Esquire
766 Shrewsbury Avenue, Suite 301
Tinton Fall, New Jersey 07724
Attorneys for Plaintiffs
(732)-747-5202

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----X
WENGUI GUO
a/k/a MILES KWOK

Civil Action No.:

Plaintiff,

COMPLAINT

v.

JUN CHEN a/k/a JONATHAN HO

Defendant.
-----X

Plaintiff, Wengui Guo, a/k/a Miles Kwok (hereinafter, “Guo” or “Plaintiff”), by counsel, The Law Offices of Cohen & Howard, LLP, for his complaint against Defendant Jun Chen a/k/a Jonathan Ho (hereinafter, “Ho” or “Defendant”), states the following:

STATEMENT OF THE CASE

Plaintiff brings this action for the false, misleading, disparaging, defamatory, and physically threatening statements by Defendant regarding Plaintiff and his family members.

1. Plaintiff Guo is a Chinese political dissident living in at 751 Fifth Avenue, in New York, New York. From the beginning of 2015, he regularly speaks on YouTube and Twitter about Chinese politics and human rights issues.

2. Guo is a pioneer of using YouTube and Twitter to fight for the rule of law, human rights, freedom and democracy in China. Guo has exposed widespread corruption in the Chinese

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

**WENGUI GUO
a/k/a MILES KWOK
781 Fifth Avenue, 18th Floor
New York, New York 10022**

Plaintiff,

v.

**YELIANG XIA
14735 Pennshire Drive
Haymarket, Virginia 20169**

Defendant.

Civil Action No. 1:18-cv-174

**VERIFIED COMPLAINT
FOR INJUNCTIVE RELIEF AND MONEY DAMAGES**

Plaintiff, Wengui Guo, a/k/a Miles Kwok (“Guo”), by counsel, Ward & Berry, PLLC, for his complaint against Defendant Yeliang Xia (“Xia”), states the following:

STATEMENT OF THE CASE

Plaintiff brings this action for the false, misleading, disparaging, defamatory, and physically threatening statements by Defendant regarding Plaintiff and his family members.

1. Plaintiff Guo Wengui, a/k/a Miles Kwok (“Guo”) is a Chinese political dissident living in New York City. Since 2015 Guo has regularly spoken on YouTube and Twitter about Chinese politics and human rights issues.

2. Guo is a pioneer of using YouTube and Twitter to fight for the rule of law, human rights, freedom and democracy in China. Guo has exposed widespread corruption in the Chinese Communist Party (“CCP”), including multiple senior officials of the Chinese Government and their family members.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the
Central District of California

WENGUI GUO a/k/a MILES
KWOK, an individual,

Plaintiff(s)

v.

JIANBIN YUAN, an individual,

Defendant(s)

Civil Action No. 2:18-cv-2276 -SVW (JCx)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

JIANBIN YUAN
2636 Jurado Avenue
Hacienda Heights, CA 91745

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Neil M. Sunkin
LAW OFFICE OF NEIL M. SUNKIN,
A Professional Corporation
22908 Gershwin Dr.
Woodland Hills, CA 91364

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Kiry Gray
CLERK OF COURT

Date: March 20, 2018

E. Liberto

Signature of Clerk or Deputy Clerk



FW: 转发: 郭媒体 GUO. x

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mre@juwlaw.com

Michael R. Ernst, ESQ.
Nevada Bar No. 11957
mre@juwlaw.com
JOLLEY URG A WOODBURY HOLTHUS & ROSE
330 S. Rampart Blvd., Suite 380
Las Vegas, Nevada 89145
Attorneys for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

WENGUI GUO a/k/a MILES KWOK, Plaintiff, vs. SHUIYUAN CHENG, Defendant.	Case No. A-18-779172-C Dept No. Department 32 <u>COMPLAINT</u> <u>Arbitration Exemption:</u> Amount in Controversy Exceeds \$50,000
--	---

Plaintiff, Wengui Guo, a/k/a Miles Kwok (hereinafter, "Guo" or "Plaintiff"), by and through his attorneys, Jolley Urga Woodbury Holthus & Rose, as and for his complaint against Shuiyuan Cheng (hereinafter "Cheng," or "Defendant"), hereby alleges and states as follows:

STATEMENT OF THE CASE

1. Plaintiff brings this action for the false, misleading, disparaging, defamatory, and physically threatening statements by Defendant regarding Plaintiff.

PARTIES

2. Guo is and was at all times relevant hereto an adult resident of New York, New York.

SUPREME COURT
OF BRITISH COLUMBIA
VANCOUVER REGISTRY

No. S-187450
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA
JUL 04 2018

BETWEEN:



GUO WENGUI

PLAINTIFF

AND:

BINGCHEN GAO

DEFENDANT

NOTICE OF CIVIL CLAIM

This action has been started by the plaintiffs for the relief set out in Part 2 below.

If you intend to respond to this action, you or your lawyer must

- (a) file a response to civil claim in Form 2 in the above-named registry of this court within the time for response to civil claim described below, and
- (b) serve a copy of the filed response to civil claim on the plaintiff.

If you intend to make a counterclaim, you or your lawyer must

- (a) file a response to civil claim in Form 2 and a counterclaim in Form 3 in the above-named registry of this court within the time for response to civil claim described below, and
- (b) serve a copy of the filed response to civil claim and counterclaim on the plaintiff and on any new parties named in the counterclaim.

JUDGMENT MAY BE PRONOUNCED AGAINST YOU IF YOU FAIL to file the response to civil claim within the time for response to civil claim described below.

Time for response to civil claim

A response to civil claim must be filed and served on the plaintiffs,

- (a) if you were served with the notice of civil claim anywhere in Canada, within 21 days after that service,
- (b) if you were served with the notice of civil claim anywhere in the United States of America, within 35 days after that service,
- (c) if you were served with the notice of civil claim anywhere else, within 49 days after that service, or
- (d) if the time for response to civil claim has been set by order of the court, within that time.

Dear USCIS and U.S. ICE, Enforcement and Removal Operations:

Reporting Guo Wengui that has repeatedly violated US immigration laws and is suspected of collaborating with Chinese hackers to frame Chinese human rights activists

Guo Wengui is also known as WENGUI GUO a/k/a, MILES KWOK

Its residential address: 781 5th Ave # 18THFLOOR, New York, NY 10022

Guo Wengui is an economic fugitive wanted by the Chinese government, He is applying for political asylum in the United States. But he repeatedly claimed that he is a US citizen, He has a multinational passport. He has also lied on his birthday and the time he applied for political asylum. (See the attached CD)

Guo Wengui has a close relationship with the Chinese spy agency MSS(The Ministry of State Security). He lied to deceive the Chinese society by saying that he is pursuing China's democratic freedom. This way, he can gain social influence and negotiate with the Chinese government and obtain US political asylum. In fact, he has been negotiating with the Chinese government to get his own interests. He has also continued to suppress overseas exiled human right activists, insulted and used lawsuits against Chinese human rights activists. Because of my political disagreement with Guo Wengui, I was attacked by Guo Wengui and Wang Dinggang (Luther) and Cao Changqing, both follow Guo's instructions. Guo Wengui and Wang Dinggang were suspected of collaborating with Chinese hackers and persecuting me as a Chinese human rights activist.

In Guo Wengui's June 11, 2018 video (<https://www.youtube.com/watch?v=vpMs776WLw0&t=151s>) 0:40-2:10 he said: "Yesterday, Mr. Luther received the third email from the hacker. I also read it. I am very grateful to the hacker. The hacker's behavior will be written into history, and hackers will join us to achieve our common goal." (See the attached CD)

In Guo Wengui's June 16, 2018 video (<https://www.youtube.com/watch?v=ySNFfgMbjd4&t=111s>) 0:20-1:32 he said: "The network has recently appeared in the Network Knights League. Paul and the young fellow are not hackers, they are knights. Frankly speaking, we have recently cooperated with the world's number one hacker. This hacker has been sitting for several years, and at the same time, we are cooperating with the No.4 and No.5 hackers (as ranked) in the world, and they have given us a lot of new ideas." (See the attached CD)

Guo Wengui also insulted me and other human rights activists in the following video(See the attached CD), saying that I am a liar, a spy, etc.:

June 30, 2018 part one. On Guo Baosheng's Fraud and Prosecution of Han Mei

<https://www.youtube.com/watch?v=pdOONRsuM98&t=1s>

June 5th. Meeting payers in Las Vegas. A-level wanted to commit the past

https://www.youtube.com/watch?v=YmsUSP_LLvU

June 4th. Yuan Hongbing and Xi Jinping filmed a woman's ass. The brick shot Li Keqiang is all blown like...

<https://www.youtube.com/watch?v=73TiA888Z6o>

Case 1:18-cv-00174-LO-TCB Document 1-6 Filed 02/14/18 Page 1 of 1 PageID# 44

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

WENGUI GUO a/k/a MILES KWOK

18th Avenue, 18th Floor, New York, New York 10022

(b) County of Residence of First Listed Plaintiff New York County, NY
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Print Name, Address, and Telephone Number)
Daniel S. Ward, Ward & Berry, PLLC
2020 N Street, NW, Washington, DC 20036
(202) 331-8160; dan@wardberry.com

DEFENDANTS

YELIANG XIA

18th Avenue, 18th Floor, New York, New York 10022

County of Residence of First Listed Defendant Prince William County, VA
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☐ 3 Federal Question (U.S. Government Not a Party)
☒ 4 Diversity (Indicate Citizenship of Parties in Box 3D)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☐ 1 ☒ 2 Incorporated or Principal Place of Business in This State ☐ 3 ☒ 4
Citizen of Another State ☒ 1 ☐ 2 Incorporated and Principal Place of Business in Another State ☐ 3 ☐ 4
Citizen or Subject of a Foreign Country ☐ 1 ☐ 2 Foreign Nation ☐ 3 ☐ 4

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT		TORTS		FORFEITURE/PENALTY		BANKRUPTCY		OTHER STATUTES	
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 363 Personal Injury - Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))	<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 424 Copyrights	<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 425 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 440 Deportation	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 140 Negotiable Instrument	<input checked="" type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability		<input type="checkbox"/> 426 Trademark	<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 435 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud		<input type="checkbox"/> 427 Copyrights	<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 435 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending		<input type="checkbox"/> 428 Copyrights	<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 435 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Injury		<input type="checkbox"/> 429 Copyrights	<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 435 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 153 Recovery of Overpayment of Veterans' Benefits	<input type="checkbox"/> 350 Motor Vehicle Product Liability	<input type="checkbox"/> 385 Property Damage		<input type="checkbox"/> 430 Patent	<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 435 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 490 Cable/Sat TV
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https://www.youtube.com/watch?v=LK1Vj5_jNu8&t=3546s

Here Guo Wengui is extremely affirmed that his assistant Wang Dinggang and the so-called Chinese hackers have stolen my mails. Wang Dinggang claimed that he and Chinese hackers collaborated to open my e-mail and found that I am a Chinese spy and a Taiwan spy. The following is the Video made by Wang(See the attached CD):

1. July 11, 1.2018, Paul of March 8th: Thoughts triggered by a judgment. Luther and hackers slandered my Chinese judgment as a political prisoner is fake.

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5. June 9 The hacker sent the latest emails, the amount of information is huge, what does it mean to read the contents of this email? Said that I became a spy of the Taiwan Nationalist Party.

<https://www.youtube.com/watch?v=EpsAKxv6c1Y&t=4s>

6. June 7 Heavy hit: The private letter dialogue between Luther and the mysterious hacker contains a lot of information, netizens don't miss it!

<https://www.youtube.com/watch?v=UN070niScTs&t=346s>

7. June 5 Luther received a hacker dialogue between mysterious people, including what types of scandal? Revealing who is selling the soul and selling the conscience?

<https://www.youtube.com/watch?v=GJ7yFjrD7TM&t=8s>

8. June 4th, Twitter was shocked by a nuclear explosion level secret email illustrating Guo Wengui, is messing up Luther interviews and chat rooms. What signal did this message convey?

<https://www.youtube.com/watch?v=nEMpdY6MiSA&t=262s>

Guo Wengui and his followers designed scams, fake verdicts and other fake events against me. They are fighting against human rights activists and completely doing what the Chinese Communist Party's dictatorship wants. They are not worthy of applying for political asylum in the United States, and have

been suspected of serious crimes – working with Chinese hackers to persecute exiled human right activists in the United States.

Guo Wengui's more detailed evidence is on the attached CD, including Guo Wengui's relationship with MSS(The Ministry of State Security),his speech video to worship Xi Jinping, his statement to rely on the Chinese Communist Party to fight corruption, the open letter to Xi Jinping on August 26, 2017.

On the other hand, Guo Wengui repeatedly claimed that he is a US citizen. He has a multinational passport. He has also lied on his birthday and the time he applied for political asylum. The above video evidence is on the attached CD.

I am Guo Baosheng, born in China in 1972 and now a US citizen (attached to the document). I was arrested in 1994 in China for Chinese democracy. In 1997, I was sentenced to three and a half years by the Chinese Communist regime for conspiring to subvert the government. (A copy of the judgment is attached). In 1996 and 1997, the US Department of State's Human Rights Report repeatedly mentioned my name and persecution(attached to the document):

https://1997-2001.state.gov/global/human_rights/1996_hrp_report/china.html

1996 US State Department China Human Rights Report

https://1997-2001.state.gov/global/human_rights/1997_hrp_report/china.html

1997 US State Department Human Rights Report

After I arrived in the United States at the end of 2008, I was mainly engaged in Christian church work and overseas democratic human rights activities. After moving to Virginia at the end of 2015, I was mainly engaged in political commentary and self-media commentary work.

BAOSHENG GUO Email: mandeusa@gmail.com Tel:2282355736

14440 CLUBHOUSE RD GAINESVILLE VA20155

8/1/2018



Dear FBI:

Reporting Guo Wengui that is suspected of collaborating with Chinese hackers to frame Chinese human rights activists

Guo Wengui is also known as WENGUI GUO a/k/a, MILES KWOK

Its residential address: 781 5th Ave # 18THFLOOR, New York, NY 10022

Guo Wengui is an economic fugitive wanted by the Chinese government. He has a close relationship with the Chinese spy agency MSS(The Ministry of State Security). He lied to deceive the Chinese society by saying that he is pursuing China's democratic freedom. This way, he can gain social influence and negotiate with the Chinese government and obtain US political asylum. In fact, he has been negotiating with the Chinese government to get his own interests. He has also continued to suppress overseas exiled human right activists, insulted and used lawsuits against Chinese human rights activists. Because of my political disagreement with Guo Wengui, I was attacked by Guo Wengui and Wang Dinggang (Luther) and Cao Changqing, both follow Guo's instructions. Guo Wengui and Wang Dinggang were suspected of collaborating with Chinese hackers and persecuting me as a Chinese human rights activist.

In Guo Wengui's June 11, 2018 video (<https://www.youtube.com/watch?v=vpMs776WLw0&t=151s>) 0:40-2:10 he said: "Yesterday, Mr. Luther received the third email from the hacker. I also read it. I am very grateful to the hacker. The hacker's behavior will be written into history, and hackers will join us to achieve our common goal." (See the attached CD)

In Guo Wengui's June 16, 2018 video (<https://www.youtube.com/watch?v=ySNFfgMbjd4&t=111s>) 0:20-1:32 he said: "The network has recently appeared in the Network Knights League. Paul and the young fellow are not hackers, they are knights. Frankly speaking, we have recently cooperated with the world's number one hacker. This hacker has been sitting for several years, and at the same time, we are cooperating with the No.4 and No.5 hackers (as ranked) in the world, and they have given us a lot of new ideas." (See the attached CD)

Guo Wengui also insulted me and other human rights activists in the following video(See the attached CD), saying that I am a liar, a spy, etc.:

June 30, 2018 part one. On Guo Baosheng's Fraud and Prosecution of Han Mei

<https://www.youtube.com/watch?v=pdOONRsuM98&t=1s>

June 5th. Meeting payers in Las Vegas. A-level wanted to commit the past

https://www.youtube.com/watch?v=YmsUSP_LLvU

June 4th. Yuan Hongbing and Xi Jinping filmed a woman's ass. The brick shot Li Keqiang is all blown like...

<https://www.youtube.com/watch?v=73TiA888Z6o>

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Guo Wengui and his followers designed scams, fake verdicts and other fake events against me. They are fighting against human rights activists and completely doing what the Chinese Communist Party's dictatorship wants. They are not worthy of applying for political asylum in the United States, and have been suspected of serious crimes – working with Chinese hackers to persecute exiled human right activists in the United States.

Guo Wengui's more detailed evidence is on the attached CD, including Guo Wengui's relationship with MSS(The Ministry of State Security),his speech video to worship Xi Jinping, his statement to rely on the Chinese Communist Party to fight corruption, the open letter to Xi Jinping on August 26, 2017.

On the other hand, Guo Wengui repeatedly claimed that he is a US citizen. He has a multinational passport. He has also lied on his birthday and the time he applied for political asylum. The above video evidence is on the attached CD.

I am Guo Baosheng, born in China in 1972 and now a US citizen (attached to the document). I was arrested in 1994 in China for Chinese democracy. In 1997, I was sentenced to three and a half years by the Chinese Communist regime for conspiring to subvert the government. (A copy of the judgment is attached). In 1996 and 1997, the US Department of State's Human Rights Report repeatedly mentioned my name and persecution(attached to the document):

https://1997-2001.state.gov/global/human_rights/1996_hrp_report/china.html

1996 US State Department China Human Rights Report

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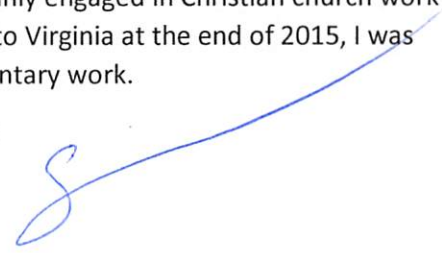
1997 US State Department Human Rights Report

After I arrived in the United States at the end of 2008, I was mainly engaged in Christian church work and overseas democratic human rights activities. After moving to Virginia at the end of 2015, I was mainly engaged in political commentary and self-media commentary work.

BAOSHENG GUO Email: mandeusa@gmail.com Tel:2282355736

14440 CLUBHOUSE RD GAINESVILLE VA20155

8/1/2018



Dear Senate Richard H.Black:

I am so glad to receive your letter. I am a US citizen and voter in your Senatorial District. My name is Guo Bao-sheng, U.S. citizens, Chinese dissident and human rights activist, Chinese political and religious affairs commentators. I hope you can help for these issues:

Reporting Guo Wengui that excessive lawsuits abuse for Overseas Chinese human rights activists and Guo Wengui is suspected of collaborating with Chinese hackers to frame Chinese human rights activists

Guo Wengui is also known as WENGUI GUO a/k/a, MILES KWOK

Its residential address: 781 5th Ave # 18THFLOOR, New York, NY 10022

Guo Wengui is an economic fugitive wanted by the Chinese government. He has a close relationship with the Chinese spy agency MSS(The Ministry of State Security). He lied to deceive the Chinese society by saying that he is pursuing China's democratic freedom. This way, he can gain social influence and negotiate with the Chinese government and obtain US political asylum. In fact, he has been negotiating with the Chinese government to get his own interests.

He has also continued to suppress overseas exiled human right activists, insulted and used lawsuits against Chinese human rights activists. he excessive lawsuits abuse for Overseas Chinese human rights activists, The human rights activists he had lawsuitsed were: Teng Biao, Xia Yeliang, Chen Jun, Yuan Jianbin, Cheng Shuiyan and Guo Baosheng, etc., nearly 20 peoples (see attachment).

Because of my political disagreement with Guo Wengui, I was attacked by Guo Wengui and Wang Dinggang (Luther) and Cao Changqing, both follow Guo's instructions. Guo Wengui and Wang Dinggang were suspected of collaborating with Chinese hackers and persecuting me as a Chinese human rights activist.

In Guo Wengui's June 11, 2018 video (<https://www.youtube.com/watch?v=vpMs776WLw0&t=151s>) 0:40-2:10 he said: "Yesterday, Mr. Luther received the third email from the hacker. I also read it. I am very grateful to the hacker. The hacker's behavior will be written into history, and hackers will join us to achieve our common goal." (See the attached CD)

In Guo Wengui's June 16, 2018 video (<https://www.youtube.com/watch?v=ySNFfgMbjd4&t=111s>) 0:20-1:32 he said: "The network has recently appeared in the Network Knights League. Paul and the young fellow are not hackers, they are knights. Frankly speaking, we have recently cooperated with the world's number one hacker. This hacker has been sitting for several years, and at the same time, we are cooperating with the No.4 and No.5 hackers (as ranked) in the world, and they have given us a lot of new ideas." (See the attached CD)

Guo Wengui also insulted me and other human rights activists in the following video(See the attached CD), saying that I am a liar, a spy, etc.:

June 30, 2018 part one. On Guo Baosheng's Fraud and Prosecution of Han Mei

<https://www.youtube.com/watch?v=pdOONRsuM98&t=1s>

June 5th. Meeting payers in Las Vegas. A-level wanted to commit the past

https://www.youtube.com/watch?v=YmsUSP_LLvU

June 4th. Yuan Hongbing and Xi Jinping filmed a woman's ass. The brick shot Li Keqiang is all blown like...

<https://www.youtube.com/watch?v=73TiA888Z6o>

On June 2, Ms. An Hong, Ms. Qiu Yueshou, was first interviewed. Commemorating June 4th and Yuan Hongbing. Guo Baosheng. Lai Jianping's inferior tricks!

https://www.youtube.com/watch?v=LK1Vj5_jNu8&t=3546s

Here Guo Wengui is extremely affirmed that his assistant Wang Dinggang and the so-called Chinese hackers have stolen my mails. Wang Dinggang claimed that he and Chinese hackers collaborated to open my e-mail and found that I am a Chinese spy and a Taiwan spy. The following is the Video made by Wang(See the attached CD):

1. July 11, 1.2018, Paul of March 8th: Thoughts triggered by a judgment. Luther and hackers slandered my Chinese judgment as a political prisoner is fake.

<https://www.youtube.com/watch?v=cMf1xKAWz5c&t=9s>

2. June 28, 2018, Paul's screen recording "Running My Little Mande", the process of a Trojan software obtaining emails. Luther video shows how hackers steal my emails.

<https://www.youtube.com/watch?v=MMtiJqZwUhA>

3. June 10, 2018 Mysterious hackers sent a photo of the task assignment from February 26 to April 12 (below). The hacker opened my email and found that I was a spy and accepted the task of the CCP.

<https://www.youtube.com/watch?v=DgJoB1HwU2w>

4. June 10, 2018 Mysterious hackers sent photos from February 26th to April 12th (on). The hacker opened my email and found that I was a spy and accepted the task of the CCP.

<https://www.youtube.com/watch?v=dGgNsZN2VPc&t=700s>

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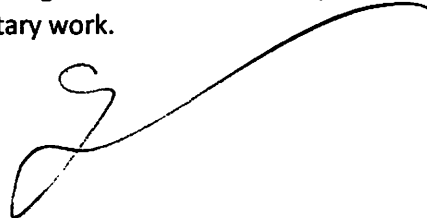
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BAOSHENG GUO Email: mandeusa@gmail.com Tel:2282355736

14440 CLUBHOUSE RD GAINESVILLE VA20155

8/27/2018



COMMONWEALTH OF VIRGINIA

SENATE OF VIRGINIA

RICHARD H. BLACK

THIRTEENTH SENATORIAL DISTRICT

PART OF LOUDOUN AND PRINCE
WILLIAM COUNTIESCOMMITTEE ASSIGNMENTS:
AGRICULTURE, CONSERVATION AND
NATURAL RESOURCES
COMMERCE AND LABOR
EDUCATION AND HEALTH
GENERAL LAWS AND TECHNOLOGY
REHABILITATION AND SOCIAL
SERVICES

July 24, 2018

Bao Sheng Guo
14440 Clubhouse Rd.
Gainesville, VA 20155-3816

Dear Bao Sheng:

I understand that you recently registered to vote in the 13th Senatorial District. Voting is one of the most important rights that Americans enjoy, and I hope that you will make your voice heard in our local, state, and federal elections. I wanted to write to thank you for registering, and to introduce myself as your representative in the Senate of Virginia.

The 13th District was created after the 2010 Census to reflect the high rate of growth in the suburbs of Northern Virginia. The district comprises Ashburn, southern Leesburg, Lovettsville, Purcellville, and South Riding in Loudoun County along with the Gainesville, Haymarket, Bull Run, and Manassas sections of Prince William County. The 13th District includes suburban and rural areas where citizens are concerned about issues ranging from agriculture to transportation, from natural resources to education, from Lyme disease to job creation. As your Senator, I work on all of these issues and more. I hope you will let me know your ideas and opinions so I may better represent you.

I was elected to the Senate in November 2011. Previously, I served for eight years in the Virginia House of Delegates representing the 32nd District in Loudoun County. I spent my early career as a Marine pilot. I flew 269 combat missions and was wounded in action during the Vietnam War. After attending law school, I served as an Army JAG officer. During my final assignment at the Pentagon, I prepared Executive Orders for the President's signature and advised the House and Senate Armed Services Committees regarding military legal issues. I retired from military service in 1994 to become a partner in a Virginia law firm.

In the Senate, I serve on five committees: Agriculture, Conservation, and Natural Resources, Commerce and Labor, Education and Health, General Laws and Technology, and Rehabilitation and Social Services. I also serve on the Northern Virginia Transportation Commission and am a member of the Board of Trustees for the Virginia War Memorial. In the community, I am a member of the National Federation of Independent Business (NFIB), the Knights of Columbus, and several veterans' organizations. My wife Barbara and I live in Ashburn, Virginia.

My office has always taken a special interest in resolving traffic problems affecting our fast-growing district. I was particularly pleased to have sponsored the legislation that created the Route 28 Freeway-- one of the most successful transportation initiatives in Virginia history. While the area's vibrant economy will always present new challenges, you may rest assured that my Legislative Aide, Kirk Lundby, and I are constantly working to address them.

I invite you to visit my website at www.senatorblack.com to learn more about our Senatorial office. On my website, you can also sign up to receive periodic e-mail updates. Please let me know how I may assist you with legislative issues and matters involving state government. You can contact me at 703-468-1342 or via e-mail at district13@senate.virginia.gov. It is my honor to serve as your State Senator.

Sincerely,



Richard H. Black

COMMONWEALTH OF VIRGINIA

SERVE



PRINCE WILLIAM CIRCUIT COURT

Civil Division
9311 LEE AVENUE
MANASSAS VA 20110
(703) 792-6029

Summons

To: GUO BAOSHENG
14440 CLUBHOUSE RD
GAINESVILLE VA 20155

Case No. 153CL18006754-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Monday, August 13, 2018

Clerk of Court: JACQUELINE C SMITH

by Kara Jordan

(CLERK/DEPUTY CLERK)

Instructions: COMPLAINT

Hearing Official:

Attorney's name: MORRISSY, J DAVID
409 7TH STREET NW STE 300
202-783-0316
WASHINGTON DC 20004

VIRGINIA:

IN THE CIRCUIT COURT OF PRINCE WILLIAM COUNTY

WENGUI GUO
a/k/a MILES KWOK
781 Fifth Avenue, 18th Floor
New York, New York 10022

Plaintiff,

v.

BAOSHENG GUO
14604 Shelford Way
Gainesville, Virginia 20155

Defendant,

Civil Action No. 18-6754

COMPLAINT

Plaintiff, Wengui Guo, a/k/a Miles Kwok (“Guo” or “Plaintiff”), by his counsel, Zeichner Ellman & Krause LLP, for his complaint against Defendant Baosheng Guo (“Baosheng” or “Defendant”), states the following:

STATEMENT OF THE CASE

Plaintiff brings this action for the false, misleading, disparaging, and defamatory statements by Defendant regarding Plaintiff and his family members and for Defendant’s fraudulent misrepresentations to Plaintiff.

PARTIES, JURISDICTION AND VENUE

1. Guo is and was at all time relevant hereto an adult resident of New York, New York.

2. Defendant is and was at all times relevant hereto an adult resident of the Commonwealth of Virginia.

3. Jurisdiction is proper because a substantial part of the events giving rise to the claims presented herein occurred in this Judicial District, and Defendant is found in this Judicial District..

4. Venue is proper in the Court because a substantial part of the events giving rise to the claims presented herein occurred in this Judicial District, and Defendant is found in this Judicial District.

FACTUAL BACKGROUND

5. Plaintiff Guo is a Chinese political dissident living in New York City. Since early 2015, Guo has regularly spoken on YouTube and Twitter about Chinese politics and human rights issues.

6. Guo is a pioneer of using YouTube and Twitter to fight for the rule of law, human rights, freedom and democracy in China. Guo has exposed widespread corruption in the Chinese Communist Party (“CCP”), multiple senior officials of the Chinese Government, and their family members.

7. Guo’s whistleblower actions have made an unprecedented impact on the international image and credibility of the CCP. Guo’s disclosures show the many ways in which Chinese people are tortured under the kleptocracy.

8. Guo's Twitter account, @KwokMiles, has close to 475,000 followers at present. He has the largest number of supporters among all Chinese Twitter users. Guo regularly uses this account to engage with other Chinese dissidents.

9. In the past 70-year rule of the Communist Party, Guo is the only one who single-handedly challenged the CCP and exposed the CCP's building of an intelligence network in the United States and other countries.

10. Guo has exposed the degree of China's cultural, political, economic and intelligence penetration in the United States and the West, which has sparked strong reaction in the world. Guo is a true advocate of democracy, freedom and rule of law in China.

Guo's Childhood

11. Guo grew up very poor in the Northeast of China, where his parents were exiled by the CCP during the Cultural Revolution.

12. Because of his experience in the Cultural Revolution, Guo was opposed to the system of communism and hegemony when he was a boy.

13. Guo, his seven brothers, and his parents lived in a harsh, austere, frigid and unjust social and political environment throughout his childhood.

14. Guo's childhood conditions were so severe that, as a child, Guo would regularly check the communal water well to find his mother when he would lose sight of her to make sure she did not commit suicide by jumping into the well to end the constant suffering.

15. Guo has spoken out about such unjust social behaviors. For example, Guo has many times in his videos appealed for a mother living in a poor Chinese mountainous area who killed her four sons and then committed suicide due to poverty. This poor mother

committed suicide because her RMB300 (about \$50) poverty alleviation fund was embezzled by local officials.

16. As a teenager, Guo began his life as a businessman. He dropped out of middle school to focus on selling jeans, radios, and other electronics. He used his earnings to help poor people like him and to improve his family's living conditions.

17. Due to the extreme poverty of his family and his precocity, Guo was opposed to traditional feudal marriage and paid more attention to family values.

18. Guo met his wife in 1985 and married her in elopement. They've been lovingly married for 33 years and are still married today. They had a son and a daughter.

19. This is hardly achievable among all the successful entrepreneurs at that time given the economic and political conditions in the several decades after the reform and opening-up of China.

20. At the time Guo and his wife were married, the CCP fully controlled all of China and no private business was allowed. As Guo constantly struggled to feed, clothe and shelter his family, he cherished the poor and the grassroots and understood their life. He became more unsatisfied with the autocratic system and the one-party system of the CCP. Meanwhile, Guo was also one of the entrepreneurs who made his fortune and achieved early success via his own efforts at that time.

21. During the Tiananmen Square Massacre in 1989, Guo was arrested on May 26 and sent to jail for two years because he sold his imported motorbike and donated the vast majority of the proceeds (RMB3,600, about \$500) to the protesting students in different places. When the police knew what Guo did, they arrested him for "commercial fraud" and "illegal operation" and imprisoned him for two years (1989-1991).

22. During his imprisonment, he was jailed together with many pro-democracy activists and political dissidents, when he began his life against the autocratic regime of the CCP.

23. During the arrest on May 26, 1989, two drunken policemen raided Guo's office and fired their weapons directly at his young wife, who was holding his three-month-old baby daughter. His younger brother, the eighth brother in the family, tried to protect Guo's wife and daughter, and as a result was shot twice in the altercation.

24. Guo's brother was then sent to the hospital, but the policemen who shot him instructed the doctors to refuse him any medical care and locked the door. As a result, Guo's brother, only one week to 18 years old at that time, died two days later from exsanguination.

25. This incident intensified Guo's disdain towards the autocratic regime and social inequality and the enlightenment that China was in need of democracy, rule of law and freedom.

26. This is also the primary cause for Guo to fight against autocracy, for rule of law, democracy and freedom 29 years later.

27. As a result of these tragic events, all of which flowed from his charitable and selfless donation to the Tiananmen Square protesters, Guo vowed to become a persistent and brave advocate against the Chinese kleptocracy.

28. During the two-year imprisonment, Guo made acquaintance with the imprisoned pro-democracy activists, who gave him the education of religion, rule of law and democracy, and planned for having strong financial capability to pay back his parents. He also hoped to become a man of influence in a certain field.

29. According to his plan, after once Guo's children were grown and he obtained good care for his parents, Guo would start fighting for rule of law, democracy and freedom.

Guo's Family

30. As discussed above, Guo and his wife were married when he was 15 years old and his wife was 14 years old. They remain married today (never divorced) more than 33 years later.

31. Because of the impact of the Cultural Revolution, China does not have a well-established household registration and passport information system.

32. In China, many people would apply for ID cards or passports after they legally become adults.

33. Thus, Despite Guo's passports showing a birth year of 1968, he was in fact born in 1970.

34. Guo became a father to a son when he was 16 years old. Guo's son is now a very talented and successful investor.

35. Guo became a father to a daughter when he was 18 years old. Guo's daughter lives with her parents in New York City. She graduated from New York University and is now a talented film director.

36. Guo's daughter worked as the vide-director to Mr. Yimou ZHANG in Mainland China. Mr. Zhang is the director of many internationally acclaimed movies, including Crouching Tiger, Hidden Dragon, which was very well received in the West. Guo's daughter also directed several short films related to public welfare issues.

37. Guo's parents are in their eighties and still live in China. They are regularly threatened, persecuted, and intimidated by the CCP as a result of Guo's whistleblowing and political advocacy.

38. Guo's parents (and, indeed all of Guo's family members who remain in China) are also under the control of the Special Task Force comprising of thousands of members from the police and central government.

39. Two of Guo's brothers are currently imprisoned in China as a result of Guo's whistleblowing and advocacy.

40. Because of Guo's opposition of the CCP regime, his accusations of corruption against senior CCP officials, and his exposing Chinese intelligence agents hidden in the United States and elsewhere in the West, 18 members of Guo's family, including his brothers and brothers-in-law, his wife and his daughter have been detained by the CCP.

41. Two brothers and a niece of Guo were sentenced to imprisonment of three years, three years and five months and two years and six months, respectively.

42. Many of Guo's family members who remained in mainland China have been (and continue to be) detained, tortured, interrogated, and monitored by the Special Task Force comprising several thousands of members from the police.

43. Many of Guo's colleagues have disappeared and left no trace.

44. Since his exile, the CCP has seized more than \$17,000,000,000.00 in cash and assets owned by Guo's family and himself.

Guo's Business

45. Throughout the 1990s and 2000s, Guo (and his family members) became involved in the real estate business in mainland China.

46. Guo and his family established Henan Yuda in 1991. Henan Yuda is a high-end commercial complex project started with an investment of more than \$300,000.00. At the time of its construction, the hotel was the most high-class as well as one of the five tallest buildings in China.

47. Guo's credits the success of the Henan Yuda project to Guo's spiritual and cultural growth while he was imprisoned for two years. It was also the result of Guo's strong will to revolutionize China's system and the miracle in commemoration of the death of his younger brother.

48. In 1999, Guo and his family established Pangu Plaza (500,000 square meters) and Zenith Plaza (1.5 million square meters).

49. Beijing Pangu was designed by Guo and noted Taiwanese architect C.Y. Lee.

50. Beijing Pangu is the only privately owned commercial complex in the Beijing Olympic area.

51. Guo and his family invested in the Beijing Olympic area early as in 2001. That investment, at that time, exhibits Guo's precise judgment regarding China's politics and economy. The investment brought substantial return and regard for his family.

52. After completing the complex projects of Beijing Pangu and Zenith Plaza with a total area of approximately 2 million square meters, Guo announced the withdrawal of all of his family's real estate investments in disgust at the corruption of the industry in China.

53. Guo and his family started to invest in the Chinese securities and financial sectors. His family also made an acquisition of a listed company of Peking University, namely, Founder Securities Co. Ltd.

54. During Guo's career as a real estate developer, his family never secured a single piece of land from the Chinese authority nor the Chinese Government. Only private land and collectively-owned land were used in their development projects.

55. Because of the incidents in 1989 and 1991, Guo clearly separated himself from the Chinese Government and the state-owned enterprises. It was not easy for him to do so, but it is the reason for his success today.

56. Guo is a man of integrity and honesty, who is always prepared to fight for China's rule of law, democracy and freedom. It is also the fundamental reason why Guo has been subject to baseless investigations for a long time, despite not having been found guilty of any offenses.

57. From 2014 to 2015, the Chinese Government formed the Special Task Force consisting of thousands of members from the CCCDI, the Ministry of State Security and the Chinese police.

58. The Special Task Force arrested hundreds of employees who were working in Guo's family enterprises and 18 of Guo's family members.

59. The CCP also imposed controls on the mobility rights of nearly 6,000 of the family's employees.

60. The Special Task Force conducted countless investigations of Guo, but never came forward with any evidence of criminal behavior. This fact was confirmed in meetings Guo had with high ranking Chinese officials of the Ministry of State Security, representing the Central Government, in London and New York.

61. Despite these facts, Guo's financial successes and his political activism and whistleblowing against corrupt CCP officials lead to his prosecution by those corrupt CCP officials.

62. The Chinese Government is undoubtedly worried about Guo's disclosure of the corruption of its senior leaders. The Chinese Government believes that Guo has criminal and/or embarrassing evidence concerning senior government leaders and is worried about how this information will impact the CCP.

63. In response, the Chinese Government made a series of attempts to bribe, coerce and hunt down Guo.

64. The Chinese Government also made use of its overseas intelligence network to discredit Guo and pose threats to his personal safety on an unprecedented scale. Defendant Baosheng's actions are consistent with the Chinese Government's actions to discredit Guo.

65. Since the establishment of the People's Republic of China, Guo has become the premier political dissident of China who is the most influential and effective in challenging the Chinese political system and taking actions against corruption of the senior leaders.

Guo's Emergence as a Preeminent Whistleblower and Critic of Corruption

66. Due to special political conditions, the Chinese Government generally controls, supervises and threatens all large enterprises. Guo's family enterprise was also supervised and was believed to be a potential pawn used by the Ministry of State Security of China for international issues.

67. In 2006, Guo's family enterprise was blackmailed by the former Vice Mayor of Beijing, Liu Zhihua. After Guo reported it to the police, he befriended Ma Jian, the Vice Minister of State Security at the time.

68. In or about December 2014, the CCP, through Bruno Wu Zheng, called Guo.

69. Wu requested that Guo cooperate with the CCP by being obedient and stop disclosing information about corruption by senior communist officials.

70. After several failed attempts of bribing, threatening and hunting down of Guo, Bruno Wu Zheng directed the CCDI and the Special Task Force to request Guo to cooperate with China and return the evidence showing the corruption of the senior leaders (including Wang Qishan, Meng Jianzhu and others) they believe Guo possessed.

71. In return, Bruno Wu Zheng promised Guo the following: (a) None of Guo's assets or properties will be seized by the CCP; (b) Ma Jian will not be arrested; (c) Guo's family members will not be arrested; and (d) Guo will not be physically threatened or killed. Guo would have to agree to be cooperative and hand over the information to the Communist Party. Guo could not be anti-communist or against the country.

72. Guo refused to accept Bruno Wu Zheng's offer, which led to the persecution of Guo and his family since 2015.

73. As a result, the CCP seized billions of dollars of Guo's family's assets and questioned and arrested 18 of Guo's family members and arrested or detained hundreds of his colleagues. Over 6,000 of Guo's colleagues have been restrained from leaving China.

74. As part of Guo's whistleblower actions, he disclosed the corruption of Hainan Group ("HNA"), which was widely reported by media outlets all over the world. The information disclosed by Guo was proven to be true.

75. Guo also disclosed the corruption of Wang Qishan and Meng Jianzhu, two of the most powerful men in China. Again, his claims were proven to be true.

76. Guo is recognized as one of the ten most dangerous challengers to Chinese Regime by Chinese Communist Party.

77. Guo's whistle blowing is regarded as the biggest political incident after the Tiananmen Square Massacre.

78. Guo is supported by more than 100 million people in Mainland of China, despite that fact that his words (and statements in support of Guo) are regularly censored by the CCP.

79. Because of Guo's whistleblower actions, China blocked almost all social media platforms to prevent Guo from making any further disclosure and the truth he disclosed from being known in China.

80. Guo is also supported by more than 10 million supporters outside of China. In May 2017, Guo's Twitter account had more than 3.8 billion impressions.

81. In another effort to silence Guo in May 2017, the CCP sent Liu Yanping and three other agents to New York City to speak with Guo.¹ At the time, Liu Yanping was Secretary of Commission for Discipline Inspection, Ministry of National Security of China.

82. Guo refused this threat as well, choosing instead to disclose the existence of a broad network of CCP spies in the United States.²

83. The visas of four officials sent by CCP, including Liu Yanping, were revoked because of their illegal actions in the United States. All of their electronic devices were taken away by U.S. law enforcement agencies at the departure hall of JFK Airport in New York.

84. The CCP took another approach to silence Guo via Interpol. The CCP issued 2 "Red Notices" against Guo. One of which was issued just a couple of hours before Guo did a

¹ See <https://www.wsj.com/articles/chinas-hunt-for-guo-wengui-a-fugitive-businessman-kicks-off-manhattan-caper-worthy-of-spy-thriller-1508717977>.

² See <http://freebeacon.com/national-security/chinas-spy-network-united-states-includes-25000-intelligence-officers/>.

live Voice of America (“VOA”) radio interview (April 2017); the second was issued just before Guo’s disclosure of Wang Qishan and HNA in September of 2017.³ The focus of the second interview was to reveal the corruptive connections between one of the most powerful officials in China, Wang Qishan and his family, and HNA, which involves trillions of renminbi.

85. The intervention of the Chinese Ministry of Foreign Affairs on the VOA interview became an international media scandal. The CCP ordered the sudden termination of the VOA interview through diplomatic means as well as illegal means (the use of its intelligence network) in the US.⁴

86. The CCP also engaged in an unprecedented propaganda campaign against Guo. The CCP formed a team of more than 10,000 people known at the “50-cent troll army.”

87. Guo was scheduled to speak at the Hudson Institute in October 2017. However, that engagement was suddenly postponed due to threats by the CCP.

88. Merely supporting Guo has become a criminal offense in mainland China. One of Guo’s supporters, Dong Qi, was reportedly arrested and sent to jail for wearing a T-shirt with Guo’s slogan “Everything is just beginning” on it.⁵ Upon information and belief, millions of Guo’s followers have been questioned, restrained, informed, and intimidated.

89. The CCP did not stop there. Guo’s previous immigration law firm, Clark Hill, was hacked by China due to its representation of Guo.⁶

³ See <https://www.washingtontimes.com/news/2017/oct/25/jeff-sessions-guo-wengui-deportation-to-china-woul/>.

⁴ See <https://www.wsj.com/articles/chinese-governments-battle-against-fugitive-guo-wengui-spills-into-washington-1507260255>.

⁵ See <https://twitter.com/cppc2014/status/952091242350960640>.

⁶ See <https://www.wsj.com/articles/chinese-governments-battle-against-fugitive-guo-wengui-spills-into-washington-1507260255>.

90. Guo's security company (T&M Protection) also suffered an unprecedented cyberattack by China.

91. The personal mobile phone of Guo, phones used by his family members, colleagues and friends have all been hacked and subjected to harassment, threat, and abuse.

92. The CCP believes Guo has evidence and information relating to widespread corruption, murders, money laundering, as well as evidence of the CCP's intelligence network in the United States.

93. For these reasons, the Chinese government sent Bruno Wu Zheng and other major property developers and entrepreneurs such as Steve Wynn to bribe, coerce, and request the President of the United States to repatriate Guo. To date, the United States government has refused these requests.

94. In or around October 2017, right before China's 19th National Congress, Guo's Twitter, YouTube, and Facebook accounts were suspended without any reason. This became a major international news story.

95. The agents and official representatives sent by the CCP constantly organized protests with the signs stating "Guo is a rapist," "Guo is a Liar" and "Get Guo out of America" at Guo's New York apartment to harass and threaten Guo.

96. Meanwhile, many purported democracy activists initiated personal attacks and attempts at intimidation against Guo. In recent months, an anti-Guo campaign, involving the use of unrestricted warfare and smearing, was initiated by the Chinese authority.

97. Upon information and belief, Baosheng is one of the activists paid by the Chinese government to destroy, defame, and otherwise oppose Guo.

98. Defendant has fraudulently held himself out to Guo (and others) as being a Chinese pro-democracy activist.

99. Defendant told Guo that Defendant needed money to continue his Chinese pro-democracy activities and solicited Guo to financially support him.

100. Beginning in August 2017, Defendant represented to Plaintiff that Defendant was going to create a group whose goal was to assist victims of the CCP (the “Chinese Support Group”).

101. Baosheng stated to Guo that any money Guo donated to Baosheng would only be used to support Baosheng’s continued Chinese pro-democracy activities.

102. Based on Baosheng’s representations, Guo gave Baosheng \$42,000 in order to assist Baosheng in his fight against the CCP.

103. However, all of Baosheng’s representations to Guo were false and done only with the intent to deceive Guo into giving Baosheng money, which Baosheng always intended to use for his own personal gain.

104. Baosheng represented to Guo that Baosheng would only use any money Guo gave him to advance Baosheng’s pro-democracy and whistleblowing activities.

105. For instance, Baosheng made the following specific representations to Guo through the “WhatsApp” messaging application:

- a. On August 29, 2017 Baosheng represented to Guo that he needed \$20,000 to purchase broadcasting equipment and studio time to be used for the Chinese Support Group.

- b. On September 1, 2017, Baosheng represented to Guo that he needed \$2,000 for hotel accommodations in New York City in connection with the Chinese Support Group.
- c. On December 23, 2017, Baosheng represented to Guo that he needed \$10,000 to arrange a support conference for Guo in Washington, D.C.
- d. On February 21, 2018, Baosheng represented to Guo that he could give Guo detailed information on corrupted Chinese government officials and other individuals opposed to Guo's views towards the CCP in exchange for \$10,000.

106. Baosheng knew each of these representations were false when he made them.

107. Guo acted on these false representations and relied on them when he gave Baosheng \$42,000.00 in total.

108. Upon information and belief, Baosheng used the money given to him by Guo to purchase a house and travel the world.

109. To add insult to injury, Baosheng then used the money Guo gave him to begin a defamatory campaign against Guo.

110. Baosheng has used (and continues to use) his Twitter account to publish false, misleading, disparaging and defamatory statements about Guo to Baosheng's more than 108,000 followers, which are then "retweeted" by his followers, compounding and enhancing the harm to Guo and his family.

111. Defendant's tweets have led Plaintiff and his family to suffer substantial mental anguish and economic loss. Defendant's statements are "retweeted" by Defendant's followers tens of thousands of times, compounding the harm to Guo and his family.

112. Defendant's actions against Guo enhance the official propaganda and false accusations by the CCP against Guo.

113. Defendant's false, defamatory, and malicious Twitter posts are nothing more than blatant efforts to discredit Guo, damage Guo's reputation, jeopardize Guo's asylum application, and diminish Guo's standing in the Chinese political dissident community.

114. Specifically, on June 12, 2018, Defendant tweeted to his more than 108,000 followers that "Guo needs to seek medical attention at once for his mental illness."

115. Thereafter, on July 10, 2018, Defendant tweeted "Guo states that he was sentenced to prison during the students' movement in 1989 for providing fund to the students, but he was actually charged with false pretenses, so he was obviously lying."

116. On July 23, 2018, Defendant stated "Guo needs to seek medical attention at once for his mental illness."

117. On July 23, 2018, Defendant stated (in English, unlike his other tweets, which were in Chinese) that Guo "is suspected of collaborating with hackers to frame Chinese human rights activists." Defendant "tagged" the FBI and the Immigration and Customs Enforcement ("ICE")'s official twitter handles in this tweet.

118. On July 23, 2018, Defendant stated that "Guo forges fake documents; he even got them certified in the U.S. Guo had violated both the Chinese laws and laws in the U.S."

119. All of these statements are false, defamatory, and were meant to harm Guo.

120. Defendant knew these statements were false at the time that he made them or at least, made them with reckless disregard of their falsity.

COUNT ONE - FRAUD

121. Plaintiff repleads and realleges paragraphs 1 – 120, as if set forth herein.

122. Beginning in August 2017, Defendant represented to Plaintiff that Defendant was going to create a group whose goal was to assist victims of the CCP (the “Chinese Support Group”).

123. Defendant represented to Plaintiff that he needed financial support to purchase video equipment in order to hold a conference and take the first steps to create the Chinese Support Group.

124. On or about August 29, 2017 Defendant represented to Plaintiff that Defendant needed \$20,000 to purchase broadcasting equipment to be used for the Chinese Support Group.

125. On or about September 1, 2017 Defendant represented to Plaintiff that Defendant needed \$2,000 for travelling expenses pertaining to the Chinese Support Group.

126. On or about December 23, 2017 Defendant represented to Plaintiff that Defendant needed \$10,000 to arrange a support conference for Guo in Washington, D.C.

127. On or about February 21, 2018, Defendant represented to Plaintiff that Defendant could provide important details on corrupted Chinese government officials in exchange for \$10,000.

128. Each of these representations Defendant made were false when he made them and he knew them to be false when he made them, but he made such false representations intentionally and knowingly with the intent to mislead Plaintiff.

129. Once Defendant received the \$42,000 from Plaintiff, Defendant used those proceeds to travel around the world to places like Tokyo, Japan, and Taiwan, and also used the proceeds as a down payment on a new house.

130. Plaintiff relied on these false representations and provided the requested financial support to the Defendant.

131. Plaintiff reasonably relied on these representations because he believed Defendant to be a fellow political dissident based on Plaintiff's reputation within the Chinese political community.

132. Upon information and belief, Defendant intentionally and falsely held himself out to be Guo's appointed representative causing other individuals to invest with the Defendant, while Defendant fraudulently used proceeds he obtained for his own personal gain.

133. As a result of Defendant's misrepresentations, Plaintiff has suffered damages in an amount to be determined at trial, but not less than \$42,000.00

COUNT TWO - DEFAMATION

134. Plaintiff repleads and realleges paragraphs 1 – 132, as if set forth herein.

135. Defendant's false statements that, *inter alia*, that Plaintiff "forges fake documents," requires "medical attention at once for his mental illness," "collaborat[ed] with hackers to frame Chinese human rights activists," and is "obviously lying" are statements that accuse Plaintiff of, *inter alia*, criminal activity, thereby causing injury to Plaintiff's reputation in his trade, profession, business and community.

136. Defendant's statements enumerated herein are false and were false at the time they were made.

137. Defendant was aware of the falsity of these statements at the time he made them, or at least made these statements with reckless disregard of their falsity.

138. Defendant made these false statements with the intention of damaging Plaintiff's reputation and jeopardizing his asylum application.

139. As such, Defendant's false statements are actionable without proof of special damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment in his favor and against Defendant as follows:

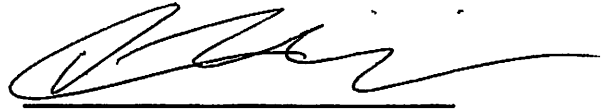
- (a) For an award of money damages in accordance with the evidence, but not less than ONE MILLION FORTY-TWO THOUSAND DOLLARS (\$1,042,000), together with interest thereon for damages to Plaintiff's personal and business reputation;
- (b) For an injunction enjoining Defendant and his respective agents, servants, employees, officers and assigns, and all other persons in active concert or participation with him or her from further publication of any false, malicious, defamatory or materially misleading comments regarding Plaintiff;
- (c) For the issuance of a public apology and retraction of all the statements regarding Guo on social media by Baosheng;
- (d) For an award of punitive damages sufficient to punish and deter the conduct complained of herein;
- (e) For attorneys' fees and costs of suit herein; and
- (f) For such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury.

Dated: August 3, 2018

Respectfully submitted,



J. David Morrissy (Va. Bar No. 93113)
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Attorneys for the Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Eastern DIVISION

BAOSHENG GUO

Plaintiff(s),

v.

Civil Action Number: 1:18-cv-01064

WENGUI GUO

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of remove.
(Title of Document)

BAOSHENG GUO

Name of *Pro Se* Party (Print or Type)

g
Signature of *Pro Se* Party

Executed on: 8/27/2018 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____.
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: _____ (Date)